

REMARKS

Claim 47 is directed to an interworking function (IWF) that interconnects a conventional TIA/EIA-136 circuit-switched network and a GPRS packet data network. Claim 47 recites that the IWF permits packet data to be routed between the GPRS network and transmitted to the mobile station over a conventional circuit-switched channel. Thus, claim 47 delivers messages from the GPRS network to the mobile station operating in the TIA/EIA-136 network. Carlsson does not disclose this aspect of claim 47. The claimed IWF allows service providers to provide packet data services in areas where there is a demand for such packet services, but not a high enough demand to warrant the investment in a packet data infrastructure. Thus, with the claimed invention, the service providers can use their existing circuit-switched infrastructures to deliver packet data.

The Examiner rejected claim 47 under §102 as being anticipated by Carlsson. Carlsson discloses an IWF between a circuit-switched network and a packet-switched network for delivering broadcast teleservice messages to a mobile terminal in the packet-switched network. The IWF in Carlsson serves a different purpose than the IWF in the claimed invention. Particularly, the Carlsson IWF functions provides a means of routing broadcast teleservice messages from a broadcast center to a mobile terminal operating in a packet-switched network. *Carlsson*, col. 6, ll. 50-52. In contrast, the purpose of the IWF in the present invention is to deliver packet data to a mobile terminal while the mobile terminal is operating within the circuit-switched network.

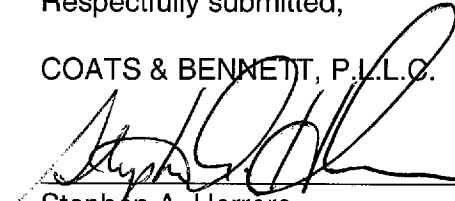
Claim 47 recites that the function of the IWF is to enable “packet data traffic to be routed between said GPRS network and said mobile station operating in said TIA/EIA-136 network.” The Carlsson IWF does not route packet data to a mobile station in a circuit-switched network as claimed. Accordingly, Carlsson does not anticipate claim 47..

The Examiner also rejected claim 51 under §102 as being anticipated by Carlsson citing reasons similar to those stated above. Claim 51, however, is the method claim that corresponds to claim 47 and includes similar limitations. Accordingly, for reasons similar to those stated above, Carlsson fails to anticipate claim 51.

In light of the foregoing remarks, Carlsson fails to anticipate any of the claims under §102. Therefore, Applicants request the Examiner withdraw all rejections and allow all pending claims.

Respectfully submitted,

COATS & BENNETT, P.L.L.C.

A handwritten signature in black ink, appearing to read "Stephen A. Herrera", is written over a horizontal line.

Stephen A. Herrera
Registration No.: 47,642

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P.O. Box 5
Raleigh, NC 27602
Telephone: (919) 854-1844
Facsimile: (919) 854-2084